

UNITED STATES DISTRICT COURT OF MASSACHUSETTS

FILE# 04-CV-11959-NG.

FILED
IN CLERKS OFFICE

FLAVIA BENITEZ
PLAINTIFF

PRO- SE

2006 JUN 29 A 9:45

VS

U.S. DISTRICT COURT
DISTRICT OF MASS.

SODEXHO- MARRIOTT
DEFENDANTS

COOLEY MANION JONES

MOTION FOR PROTECTIVE ORDER UNDE CIVIL RULE 26 (1)(b)

FLAVIA BENITEZ 'S U. S. CONSTITUTIONAL RIGHTS WILL BE
COMPROMISED WITHOUT THE PRESENCE OF AN ATTORNEY .

MASS CIVIL RULE 45 (F) AND LIABILITY FOR TORT DAMAGES
M G L A C 233 4

MASS CIVIL RULE 30 d(1) THE PHYSICAL CONDITION IS AN
ISSUE, A DEPOSITION SHALL BE TAKEN IN A NON- ARGUMEN-
TATIVE AND NON- SUGGESTIVE MANNER.

THE DEPOSITION ~~SHALL BE~~ TAKEN UNDER RULE 30 (a) (c) A DEPO
SITION SHALL NOT BE USED AGAINST A PARTY WHO DEMOSTRA
TES THAT, WAS UNABLE THROUGH THE EXERCISE OF DILIGENCE TO
OBTAIN COUNSEL TO REPRESENT AT THE TIME OF TAKING THE
DEPOSITION NOR SHALL THE DEPOSITION BE USED AGAINST A PARTY
AND FILE A PROTECTIVE ORDER UNDER RULE 26 (c) (2) .

AFTER DEPOSITION ADOPT RULE 32(d) (4) .

JUNE 29,2006

SUBMITTED BY,
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